

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION - CLEVELAND

IN RE:

)
) CASE NO. 15-12964
)
)

Kimberly R. Uber

) CHAPTER 13
)
)

Debtor

) JUDGE Jessica Price Smith
)
)

) **RESPONSE TO DEBTOR'S OBJECTION TO**
) **PROOF OF CLAIM FILED BY QUANTUM3**
) **GROUP LLC**

Creditor, Quantum3 Group LLC [QUANTUM3], by and through counsel, hereby responds to Debtors' Objection to Proof of Claim and states the following:

1. QUANTUM3 filed its proof of claim on July 9, 2015.
2. QUANTUM3 was assigned the underlying account by an assignment from Applied Bank, dated June 23, 2015.
3. Applied Bank is a creditor listed on the Debtor's Schedule F as an unsecured creditor holding a nonpriority claim. The last four digits of the listed account number are 2424.
4. QUANTUM3 amended its claim on February 16, 2017 to provide additional documentation, including the aforementioned assignment of the account, as well as several account statements that were sent to the Debtor pre-petition.

5. The last four digits of the account number listed on the statements attached to the amended proof of claim is 2424, matching the account listed in Debtor's Schedule F.

WEREFORE, Creditor prays that this Court find that the account referenced in the Proof of Claim was assigned to QUANTUM3 from Applied Bank; that this Court find that the Proof of Claim, as amended, be allowed as filed; and for such other and further relief as this Court deems proper.

Respectfully Submitted;

/s/ Edward A. Bailey
REIMER, ARNOVITZ, CHERNEK &
JEFFREY CO., L.P.A.
BY: Peter M. O'Grady #0093349
BY: Cynthia A. Jeffrey #0062718
BY: Edward A. Bailey #0068073
P.O. Box 39696
30455 Solon Road
Solon, OH 44139
Phone: (440) 600-5500
Fax: (440) 600-5522
Attorneys for Creditor
ebailey@reimerlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response was served (i) electronically on date of filing through the court's ECF System on all ECF participants registered in this case at the email registered with the court (ii) ordinary U.S. mail, on February 23, 2017 addressed to:

1. Kimberly R. Uber, Debtor
12601 Eastwood Boulevard
Cleveland, OH 44125

/s/ Edward A. Bailey
REIMER, ARNOVITZ, CHERNEK &
JEFFREY CO., L.P.A.
BY: Peter M. O'Grady #0093349
BY: Cynthia A. Jeffrey #0062718
BY: Edward A. Bailey #0068073
P.O. Box 39696
30455 Solon Road
Solon, OH 44139
Phone: (440) 600-5500
Fax: (440) 600-5522
Attorneys for Creditor
ebailey@reimerlaw.com